

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Complaint of

Democratic Senatorial Campaign Committee

MUR 3774

**ANSWER OF COALITIONS FOR AMERICA
TO SUPPLEMENTAL COMPLAINT**

I. Introduction

The Federal Election Commission ("FEC") by letter dated March 6, 1995, forwards a 37-page package.

The package includes a seven-page document entitled "Supplemental Complaint" evidently filed on February 22, 1995 by Counsel for the Democratic Senatorial Campaign Committee ("DSCC") as a supplement to its Complaint dated May 6, 1993. The original Complaint was an integral part of a campaign to attempt to set aside, or otherwise impune, the election of Senator Paul R. Coverdell over former Senator Wyche Fowler, Jr., which occurred on November 24, 1992. The original Complaint more readily was recognizable as a political polemic than a proper pleading. Coalitions for America ("CFA") somewhat inexplicably was named as a Respondent.

The so-called Supplemental Complaint asks FEC to "take immediate action to investigate the [National Republican Senatorial Committee] and to impose all civil penalties available..."

The Supplemental Complaint does not name, mention, refer to or alude to CFA. It appears to relate to alleged activity by Respondent National Republican Senatorial Committee involving the 1994 elections of Senators Rodney D. Grams in Minnesota and Rick Santorum in Pennsylvania. While the Supplemental Complaint does refer, expansively and somewhat ambiguously, to other organizations, there is no hint of CFA implication.

II. Issue

The Supplemental Complaint raises no issue as to CFA.

III. Argument

Counsel for Complainant offered no fact to establish CFA participation, much less culpability, in any unlawful act involving the 1992 Coverdell election.

The Supplemental Complaint goes further, neither mentioning nor hinting at any CFA activity.

IV. Conclusion

CFA refers to its Answer dated June 23, 1993 and incorporates the same herein by reference.

For the reasons set forth therein, FEC forthwith should have dismissed the Complaint as to CFA.

The farce now continues, at the expense of CFA, in the form of a Supplemental Complaint devoid of any reference to CFA.

FEC forthwith should dismiss CFA from MUR 3774.

The DSCC and FEC have had almost two years to adduce evidence of CFA involvement in the Coverdell campaign. Not a scintilla of evidence has been adduced. The farce is compounded with the filing of a Supplemental Complaint which does not even hint at CFA involvement in further campaigns, those of Senators Grams and Santorum.

Injustice is visited upon a respondent when a complainant is permitted to file vacuous complaints and supplemental complaints, requiring a respondent to expend time and funds in defending itself. FEC must impose upon itself that minimum requirement of the allegation of a cause of action which is applicable in any court of law.



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March 27, 1995

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Complaint of

Democratic Senatorial Campaign Committee

MUR 3774

**ANSWER OF FREE CONGRESS FOUNDATION
TO SUPPLEMENTAL COMPLAINT**

I. Introduction

The Federal Election Commission ("FEC") by letter dated March 6, 1995, forwards a 37-page package.

The package includes a seven-page document entitled "Supplemental Complaint" evidently filed on February 22, 1995 by Counsel for the Democratic Senatorial Campaign Committee ("DSCC") as a supplement to its Complaint dated May 6, 1993. The original Complaint was an integral part of a campaign to attempt to set aside, or otherwise impune, the election of Senator Paul R. Coverdell over former Senator Wyche Fowler, Jr., which occurred on November 24, 1992. The original Complaint more readily was recognizable as a political poiemic than a proper pleading. Free Congress Foundation ("FCF") was not named as a Respondent. However, FEC served National Empowerment Television ("NET"), an FCF division.

The so-called Supplemental Complaint asks FEC to "take immediate action to investigate the [National Republican Senatorial Committee] and to impose all civil penalties available..."

The Supplemental Complaint does not name, mention, refer to or alude to FCF or NET. It appears to relate to alleged activity by Respondent National Republican Senatorial Committee involving the 1994 elections of Senators Rodney D. Grams in Minnesota and Rick Santorum in Pennsylvania. While the Supplemental Complaint does refer, expansively and somewhat ambiguously, to other organizations, there is no hint of FCF or NET implication.

II. Issue

The Supplemental Complaint raises no issue as to FCF or NET.

III. Argument

Counsel for Complainant offered no fact to establish FCF or NET participation, much less culpability, in any unlawful act involving the 1992 Coverdell election.

The Supplemental Complaint goes further, neither mentioning nor hinting at any FCF or NET activity.

IV. Conclusion

FCF refers to its Answer dated June 23, 1993 and incorporates the same herein by reference.

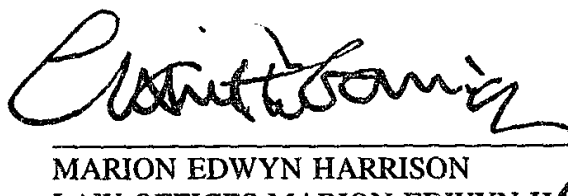
For the reasons set forth therein, FEC forthwith should have dismissed the Complaint as to FCF and NET.

The farce now continues, at the expense of FCF, in the form of a Supplemental Complaint devoid of any reference to FCF or NET.

FEC forthwith should dismiss FCF, and with it NET, from MUR 3774.

The DSCC and FEC have had almost two years to adduce evidence of FCF or NET involvement in the Coverdell campaign. Not a scintilla of evidence has been adduced. The farce is compounded with the filing of a Supplemental Complaint which does not even hint at FCF or NET involvement in further campaigns, those of Senators Grams and Santorum.

Injustice is visited upon a respondent when a complainant is permitted to file vacuous complaints and supplemental complaints, requiring a respondent to expend time and funds in defending itself. FEC must impose upon itself that minimum requirement of the allegation of a cause of action which is applicable in any court of law.



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